

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD  
BRIGGS; RAJ LEE; MICHAEL  
CAMERON; MATTHEW  
SAUNDERS, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his  
official capacity as Sheriff of Oakland  
County; CURTIS D. CHILDS, in his  
official capacity as Commander of  
Corrective Services; OAKLAND  
COUNTY, MICHIGAN,

Defendants.

Case No. 20-cv-10949

Hon. Linda V. Parker

**STIPULATED ORDER REGARDING  
DISCIPLINARY TRANSFERS AT THE OAKLAND COUNTY JAIL  
DURING THE PENDENCY OF THE INSTANT LITIGATION**

The Court has reviewed and considered Plaintiffs' Motion to Enforce the Stipulated Agreement ("Stipulation") entered on April 22, 2020 (ECF 28). The Court instructed the parties to work together to develop a proposed solution to the issues raised in Plaintiffs' motion, and the parties have done so and submitted the following proposed stipulated order to the Court. Upon Stipulation of the parties, the Court **ORDERS** as follows:

1. Under no circumstances will Defendants or any jail personnel effect (or threaten to effect) a transfer, for disciplinary reasons, of any inmate into a quarantined area as defined below.
2. Inmates will only be moved from the East Annex to the main jail building for disciplinary reasons in one of two circumstances:
  - a. If they commit a violent act of any type; or
  - b. If they commit lesser infractions on five separate occasions and have first been subjected to each of the following progressive disciplines in any order deemed appropriate by the jail : bunk restriction, extra work detail, suspension of visitation (other than attorney visits, which will not be curtailed) and suspension of commissary. Each progressive escalation of the disciplinary process will be documented by Defendants
3. During the course of this litigation, class counsel will be notified within 24 hours after a transfer of an inmate from the East Annex to the main jail, pursuant to paragraph 2a. above. Class counsel will be notified 24 hours before any transfer of an inmate from the East Annex to the main jail pursuant to paragraph 2b. above. Supporting documentation will be provided to class counsel.

4. Any disciplinary movement of an inmate in the Main Jail/Annex will be to a “non-quarantined area” defined as movement to an entire cell block in which no cell is under quarantine at the time of transfer. However, if two or more cell blocks contain quarantined cells, then “non-quarantined area” is defined as movement to a row of cells in a cell block in which no cell in the row is under quarantine at the time of transfer. Upon request of class counsel, if a move has been noticed, a list of quarantined cells will be provided to verify compliance with this step.
5. Inmates can also be moved for reasons of documented medical necessity, pursuant to the same process.
6. Defendants will provide class counsel with a weekly list, submitted via email at the end of each week, detailing transfers within the Main Jail/Annex building including the following: 1) the name of the inmate; 2) the inmate number; 3) the inmate’s pre-transfer housing assignment; and 4) the inmate’s post-transfer housing assignment.
7. This stipulated order will remain in effect only during the pendency of the

instant litigation.

**IT IS SO ORDERED.**

s/ Linda V. Parker  
LINDA V. PARKER  
U.S. DISTRICT JUDGE

Dated: May 29, 2020

**The Parties stipulate to the above order.**

Respectfully submitted,

/s/ Krithika Santhanam  
Krithika Santhanam (DC Bar No. 1632807)  
Thomas B. Harvey (MBE #61734MO)  
Advancement Project National Office  
1220 L Street, N.W., Suite 850  
Washington, DC 20005  
Tel: (202) 728-9557  
Ksanthanam@advancementproject.org  
Tharvey@advancementproject.org

/s/ Philip Mayor  
Philip Mayor (P81691)  
Daniel S. Korobkin (P72842)  
American Civil Liberties Union  
Fund of Michigan  
2966 Woodward Ave.  
Detroit, MI 48201  
(313) 578-6803  
pmayor@aclumich.org  
[dkorobkin@aclumich.org](mailto:dkorobkin@aclumich.org)

/s/ Cary S. McGehee  
Cary S. McGehee (P42318)  
Kevin M. Carlson (P67704)  
Pitt, McGehee, Palmer,  
Bonanni & Rivers, PC  
117 W. Fourth Street, Suite 200  
Royal Oak, MI 48067  
(248) 398-9800  
cmcgehee@pittlawpc.com  
kcarlson@pittlawpc.com

/s/ Allison L. Kriger  
Allison L. Kriger (P76364)  
LaRene & Kriger, PLC  
645 Griswold, Suite 1717  
Detroit, MI 48226  
(313) 967-0100  
Allison.kriger@gmail.com

/s/ Alexandria Twinem

Alexandria Twinem

(D.C. Bar No. 1644851)

Civil Rights Corps

1601 Connecticut Ave NW, Suite 800

Washington, DC 20009

(202) 894-6126

[alexandria@civilrightscorps.org](mailto:alexandria@civilrightscorps.org)

Attorneys for Plaintiffs/Petitioners

s/STEVEN M. POTTER (P33344)

POTTER, DeAGOSTINO, O'DEA & CLARK

Attorneys for Defendants

2701 Cambridge Court, Suite 223

Auburn Hills, Michigan 48326

(248) 377-1700

[spotter@potterlaw.com](mailto:spotter@potterlaw.com)